

IN THE DISTRICT COURT OF CREEK COUNTY

STATE OF OKLAHOMA

FILED IN DISTRICT COURT
CREEK COUNTY SAPULPA OK

DEC 18 2020
2:15

TIME
Amanda VanOrsdol, COURT CLERK

BRANDON HENNESSEE, an individual,
AND
RON RESAR, D/B/A
COWPOKES WRECKING SERVICE,
Plaintiffs,

DOUGLAS W. GOLDEN

v.

CASE NO. **CJ 2020-292**

JURY TRIAL DEMANDED

NEW PRIME, INC.
AND
STEVEN D. PARKER
Defendants.

AUTO ACCIDENT PETITION

COME NOW the Plaintiffs, Brandon Hennessee and Ron Resar, DBA Cowpokes Wrecker Service, and for their causes of action against the Defendants, Stevon D. Parker and New Prime, Inc., allege and state as follows:

1. Plaintiff Brandon Hennessee is a resident of Cleveland County, State of Oklahoma; Ron Resar is a resident of Oklahoma County, State of Oklahoma; Defendant New Prime, Inc. (Prime) is a corporation that employed defendant Stevon D. Parker at the time of the accident and is located in Springfield, Missouri; Stevon D. Parker (Parker) is a resident of Saint Louis County, State of Missouri; and the amount in controversy exceeds \$10,000.00.
2. On or about July 15, 2019 at approximately 5:36 p.m. on United States Interstate 44 westbound near mile marker 186, Creek County, Oklahoma, Defendant Parker, while employed by Defendant Prime, Inc. and furthering Prime's enterprise, negligently operated his vehicle to

EXHIBIT A

cause the Plaintiff's vehicle to collide with the Defendant's vehicle causing bodily injury to Plaintiff Brandon Hennessee and property damage to the vehicle owned by Plaintiff Ron Resar.

3. As a result of the Defendant's negligence, Plaintiff Brandon Hennessee sustained serious personal injuries; was prevented from transacting his business; suffered pain of mind and body; incurred past pain of mind and body; incurred past and may incur future medical expenses; and has suffered lost quality of life. As a result of the Defendant's negligence, Plaintiff Ron Resar suffered damaged to his vehicle that was being driven by Plaintiff Brandon Hennessee.

4. The collision and said injuries and harm were the direct and proximate result of the carelessness and negligence of the Defendant because the Defendant:

- a. Failed to use ordinary care to prevent injury to other people; and
- b. Failed to devote full time and attention to driving safely, which resulted in a collision with Plaintiff's vehicle.
- c. Failed to properly maintain the working parts of his vehicle.

WHEREFORE, Plaintiffs demand judgment against the Defendant in an amount exceeding \$10,000.00 together with interest, costs and any other relief the court deems just and equitable.

Respectfully submitted,



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Attorney's Lien Claimed